

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ALAN WASHINGTON,	§	
Petitioner,	§	
	§	
v.	§	Civil Action No.
	§	3:16-CV-2935-L-BT
LORIE DAVIS,	§	
Director, Texas Department of	§	
Criminal Justice, Correctional	§	
Institutions Division,	§	
Respondent.	§	

**RESPONDENT'S MOTION TO SUBSTITUTE COUNSEL
WITH BRIEF IN SUPPORT**

The Director is currently represented in this cause by the undersigned Assistant Attorney General Rachel Patton. It has become administratively necessary to reassign this case to another Assistant Attorney General, Jessica Manojlovich. As a result, the undersigned moves this Court to allow Rachel Patton to withdraw as counsel and allow Jessica Manojlovich to substitute as the Assistant Attorney General representing the Director in this federal habeas corpus action. This substitution is not requested to harass the Petitioner or to delay this proceeding. All correspondence should be sent to the same address.

For the foregoing reasons, the undersigned prays that this Court grant her motion and allow her to withdraw as counsel and substitute Jessica Manojlovich as the Assistant Attorney General representing the Director in this federal habeas corpus action.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

JEFFREY C. MATEER
First Assistant Attorney General

ADRIENNE McFARLAND
Deputy Attorney General
for Criminal Justice

EDWARD L. MARSHALL
Chief, Criminal Appeals Division

/s/ Jessica Manojlovich
JESSICA MANOJLOVICH*
Assistant Attorney General
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ATTORNEYS FOR RESPONDENT

CERTIFICATE OF CONFERENCE

I do hereby certify that a conference is not possible because Petitioner is incarcerated.

/s/ Jessica Manojlovich
JESSICA MANOJLOVICH
Assistant Attorney General

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing pleading was served by placing same in the United States Mail, postage prepaid, on this the 23rd day of August, 2018, addressed to:

Alan Washington
TDCJ No. 1985581
TDCJ Jester III Unit
3 Jester Road
Richmond, TX 77406

/s/ Jessica Manojlovich
JESSICA MANOJLOVICH
Assistant Attorney General